

Mark C. Mao, CA Bar No. 236165  
 Beko Reblitz-Richardson, CA Bar No. 238027  
**BOIES SCHILLER FLEXNER LLP**  
 44 Montgomery St., 41st Floor  
 San Francisco, CA 94104  
 Tel.: (415) 293-6800  
 mmao@bsflp.com  
 brichardson@bsflp.com

Jesse Panuccio (admitted *pro hac vice*)  
**BOIES SCHILLER FLEXNER LLP**  
 1401 New York Ave, NW  
 Washington, DC 20005  
 Tel.: (202) 237-2727  
 Fax: (202) 237-6131  
 jpanuccio@bsflp.com

Amanda K. Bonn, CA Bar No. 270891  
**SUSMAN GODFREY L.L.P.**  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel: (310) 789-3100  
 Fax: (310) 789-3150  
 abonn@susmangodfrey.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody  
 (admitted *pro hac vice*)  
 Shawn J. Rabin (admitted *pro hac vice*)  
 Steven M. Shepard (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P.**  
 1301 Avenue of the Americas,  
 32<sup>nd</sup> Floor  
 New York, NY 10019  
 Tel.: (212) 336-8330  
 bcarmody@susmangodfrey.com  
 srabin@susmangodfrey.com  
 sshepard@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)  
 Ryan J. McGee (admitted *pro hac vice*)  
 Michael F. Ram, CA Bar No. 104805  
 Ra O. Amen (admitted *pro hac vice*)  
**MORGAN & MORGAN**  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel.: (813) 223-5505  
 jyanchunis@forthepeople.com  
 rmcgee@forthepeople.com  
 mram@forthepeople.com  
 ramen@forthepeople.com

Case No.: 3:20-cv-04688

**PLAINTIFFS' STATEMENT OF  
 RECENT DECISION IN OPPOSITION  
 TO GOOGLE'S MOTION TO DISMISS  
 THE FIRST AMENDED COMPLAINT**

The Honorable Richard Seeborg  
 Courtroom 3 – 17th Floor  
 Date: March 4, 2021  
 Time: 1:30 pm

Pursuant to Local Rule 7.3(d), Plaintiffs file this Statement of Recent Decision to bring to the Court's attention Judge Koh's recent opinion in *Brown, et al. v. Google, LLC*, N.D. Cal. Case 5:20-cv-03664-LHK. A copy of the March 12, 2021 Order Denying Motion to Dismiss, Doc. No. 113, is attached as Exhibit 1.

Dated: March 17, 2021

SUSMAN GODFREY L.L.P.

By: /s/ Amanda Bonn

Amanda Bonn (CA Bar No. 270891)

abonn@susmangodfrey.com

1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

Telephone: (310) 789-3100

Mark C. Mao (CA Bar No. 236165)

mcao@bsflp.com

Beko Rebitz-Richardson (CA Bar No. 238027)

brichardson@bsflp.com

BOIES SCHILLER FLEXNER LLP

44 Montgomery Street, 41<sup>st</sup> Floor

San Francisco, CA 94104

Telephone: (415) 293 6858

Facsimile (415) 999 9695

Jesse Panuccio (admitted *pro hac vice*)

jpanuccio@bsflp.com

BOIES SCHILLER FLEXNER LLP

1401 New York Ave, NW

Washington, DC 20005

Tel.: (202) 237-2727

Fax: (202) 237-6131

James Lee (admitted *pro hac vice*)

jlee@bsflp.com

BOIES SCHILLER FLEXNER LLP

100 SE 2<sup>nd</sup> Street, Suite 2800

Miami, FL 33131

Telephone: (305) 539-8400

Facsimile: (305) 539-1307

William Christopher Carmody (*pro hac vice*)

bcarmody@susmangodfrey.com

Shawn J. Rabin (*pro hac vice*)

srabin@susmangodfrey.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Steven Shepard (*pro hac vice*)  
sshepard@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32<sup>nd</sup> Floor  
New York, NY 10019  
Telephone: (212) 336-8330

John A. Yanchunis (*pro hac vice*)  
jyanchunis@forthepeople.com  
Ryan J. McGee (*pro hac vice*)  
rmcgee@forthepeople.com  
Michael F. Ram, CA Bar No. 104805  
mram@forthepeople.com  
Ra O. Amen (*pro hac vice*)  
ramen@forthepeople.com  
MORGAN & MORGAN, P.A.  
201 N Franklin Street, 7th Floor  
Tampa, FL 33602  
Telephone: (813) 223-5505  
Facsimile: (813) 222-4736

*Attorneys for Plaintiffs*